

1 ROGER P. CROTEAU, ESQ.  
Nevada Bar No. 4958  
2 TIMOTHY E. RHODA, ESQ.  
Nevada Bar No. 7878  
3 ROGER P. CROTEAU & ASSOCIATES, LTD.  
9120 West Post Road, Suite 100  
4 Las Vegas, Nevada 89148  
(702) 254-7775  
5 (702) 228-7719 (facsimile)  
[croteaulaw@croteaulaw.com](mailto:croteaulaw@croteaulaw.com)  
6 *Attorney for Defendant*  
THUNDER PROPERTIES, INC.  
7

8  
9 UNITED STATES DISTRICT COURT  
10 DISTRICT OF NEVADA

11 \*\*\*

12 PENNYMAC LOAN SERVICES, LLC, )  
13 )  
Plaintiff, )  
14 vs. )  
15 )  
TOWNHOUSE GREENS ASSOCIATION, )  
16 INC.; THUNDER PROPERTIES, INC.; )  
GAYLE A. KEN, LTD d/b/a KERN & )  
17 ASSOCIATES LTD, )  
Defendants. )  
18 \_\_\_\_\_ )

Case No. 3:16-cv-00504-MMD-VPC

19 **STIPULATION AND ORDER TO EXTEND TIME TO**  
20 **RESPOND TO MOTION FOR SUMMARY JUDGMENT**  
(First Request)

21 COMES NOW Plaintiff, PENNYMAC LOAN SERVICES, LLC, and Defendants,  
22 THUNDER PROPERTIES, INC. and TOWNHOUSE GREENS ASSOCIATION, INC., by and  
23 through their undersigned counsel, and hereby stipulate and agree as follows:

- 24 1. On April 5, 2018, Plaintiff filed a Motion for Summary Judgment herein [ECF  
25 #78]. Responses are presently due on April 26, 2018.  
26 2. Defendants' counsel have been required to devote time and attention to numerous  
27 other pending legal matters since the filing of the Motion for Summary Judgment  
28

which have detracted from the time available prepare a response.

3. Based upon the foregoing, Defendants have requested and shall be granted an extension of time until May 17, 2018, in which to respond to the Plaintiff's Motion for Summary Judgment.

4. This Stipulation is made in good faith and not for purpose of delay.

Dated this 23<sup>rd</sup> day of April, 2018.

ROGER P. CROTEAU &  
ASSOCIATES, LTD.

AKERMAN, LLP

/s/ Timothy E. Rhoda  
TIMOTHY E. RHODA, ESQ.  
Nevada Bar No. 7878  
9120 West Post Road, Suite 100  
Las Vegas, Nevada 89148  
(702) 254-7775  
[croteaulaw@croteaulaw.com](mailto:croteaulaw@croteaulaw.com)  
*Attorney for Defendant*  
*Thunder Properties, Inc.*

/s/ Vatana Lay  
VATANA LAY, ESQ.  
Nevada Bar No. 12993  
1635 Village Center Circle, Suite 200  
Las Vegas, NV 89134  
702-634-5000  
702-380-8572 (fax)  
[vatana.lay@akerman.com](mailto:vatana.lay@akerman.com)  
*Attorney for Plaintiff*  
*Pennymac Loan Services, LLC*

TYSON & MENDES, LLP

/s/ Christopher Lund  
CHRISTOPHER AMMON LUND, ESQ.  
Nevada Bar No. 12435  
3960 Howard Hughes Parkway  
Suite 600  
Las Vegas, NV 89169  
702-724-2648  
702-938-1048 (fax)  
[clund@tysonmendes.com](mailto:clund@tysonmendes.com)  
*Attorney for Defendant*  
*Townhouse Greens Association, Inc*

IT IS SO ORDERED.

By:   
Judge, U.S. District Court

Dated: April 23, 2018

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 23<sup>rd</sup> day of April, 2018, I served via the United States District Court CM/ECF electronic filing system, the foregoing **STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO MOTION FOR SUMMARY JUDGMENT (First Request)** to the following parties:

Vatana Lay  
Akerman, LLP  
1635 Village Center Circle, Suite 200  
Las Vegas, NV 89134  
702-634-5000  
702-380-8572 (fax)  
[vatana.lay@akerman.com](mailto:vatana.lay@akerman.com)  
**Attorney for Plaintiff**  
**Pennymac Loan Services, LLC**

Ariel E. Stern  
Akerman LLP  
1635 Village Center Circle, Suite 200  
Las Vegas, NV 89134  
702-634-5000  
702-380-8572 (fax)  
[ariel.stern@akerman.com](mailto:ariel.stern@akerman.com)  
**Attorney for Plaintiff**  
**Pennymac Loan Services, LLC**

Darren T Brenner  
Akerman LLP  
1635 Village Center Circle, Suite 200  
Las Vegas, NV 89134  
702-634-5000  
702-380-8572 (fax)  
[darren.brenner@akerman.com](mailto:darren.brenner@akerman.com)  
**Attorney for Plaintiff**  
**Pennymac Loan Services, LLC**

Christopher Ammon Lund  
Tyson & Mendes LLP  
3960 Howard Hughes Parkway  
Suite 600  
Las Vegas, NV 89169  
702-724-2648  
702-938-1048 (fax)  
[clund@tysonmendes.com](mailto:clund@tysonmendes.com)  
**Attorney for Defendant**  
**Townhouse Greens Association, Inc**

Thomas E. McGrath  
Tyson & Mendes, LLP  
3960 Howard Hughes Parkway  
Suite 600  
Las Vegas, NV 89169  
702-724-2648  
702-938-1048 (fax)  
[tmcgrath@tysonmendes.com](mailto:tmcgrath@tysonmendes.com)  
**Attorney for Defendant**  
**Townhouse Greens Association, Inc**

Betsy C. Jefferis  
Phillips Spallas & Angstdt  
504 S. Ninth Street  
Suite 115  
Las Vegas, NV 89101  
702-938-1510  
702-938-1511 (fax)  
[bjefferis@psalaw.net](mailto:bjefferis@psalaw.net)  
**Attorney for Defendant**  
**Townhouse Greens Association, Inc.**

Karen M. Ayarbe  
Kern & Associates, Ltd.  
5421 Kietzke Lane, Suite 200  
Reno, NV 89511  
775-324-5930  
775-324-6173 (fax)  
[karenayarbe@kernltd.com](mailto:karenayarbe@kernltd.com)  
**Attorney for Defendant**  
**Gayle A. Kern, Ltd.**

Gayle A. Kern  
Kern & Associates, Ltd.  
5421 Kietzke Lane, Ste. 200  
Reno, NV 89511  
775-324-5930  
775-324-6173 (fax)  
[gakltd@kernltd.com](mailto:gakltd@kernltd.com)  
**Attorney for Defendant**  
**Gayle A. Kern, Ltd.**

/s/ Timothy E. Rhoda  
An employee of ROGER P. CROTEAU &  
ASSOCIATES, LTD.